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June 16, 2020

Via Electronic Case Filing and E-mail

Honorable James L. Garrity
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: Penny Ann Bradley
Case No. 18-10122 (JLG)

Dear Judge Garrity:

As you know, this firm represents creditor Atlas Union Corp. ("Atlas") in the above-referenced chapter 11 proceeding. In connection with the contemplated settlement by and among Atlas, NSM82 LLC ("NSM"), and Penny Ann Bradley (the "Debtor"), as referenced in the Debtor's letter to the Court yesterday [Dkt. 308], Atlas hereby withdraws the following pleadings without prejudice:

1. its joinder [Dkt. 133] to NSM's pending motion for the appointment of a chapter 11 trustee [Dkt. 131];
2. its objection [Dkt. 260] to the Debtor's motion to approve a settlement with Lewis H. Berman LLC ("Berman") and David Bradley [Dkt. 247]; and
3. its objection [Dkt. 263] to the Debtor's motion to dismiss this case [Dkt. 248].

To be clear, although Atlas no longer opposes the Debtor's proposed settlement with Berman,¹ and now consents to the dismissal of this chapter 11 case, Atlas explicitly reserves, and does in any way waive, the right to pursue its claims against the Debtor outside of bankruptcy.

¹ Atlas did not file an objection to the Debtor's motion to approve the settlement with Russell and Lydia Pollack [Dkt. 292].

Cole Schotz P.C.

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We thank the Court for its consideration.

Respectfully submitted,

/s/ Nolan E. Shanahan

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NES:dlr

cc: All counsel of record via e-mail